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META PLATFORMS, INC. and INSTAGRAM, LLC

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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RICHARD JACKSON, et al.,

Plaintiffs,

v.

TWITTER, INC., et al.

Defendants.

Case No. 2:22-CV-09438-AB (MAA)

**JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

**[Filed Concurrently with the
Declaration of Paven Malhotra and
[Proposed] Order]**

Judge: Hon. Andre Birotte, Jr.

Complaint Filed: December 29, 2022

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JOINT STIPULATION

Plaintiffs Richard Jackson, Julie Briggs, and Gregg Buchwalter (collectively “Plaintiffs”) and Defendants Meta Platforms, Inc., Instagram, LLC¹ (collectively “Meta”) Google LLC, Alphabet, Inc., YouTube LLC (collectively, “Google”),² Twitter, Inc., Amazon.com, Inc.,³ and the DNC Services Corporation (the “Moving Defendants”) (together with Plaintiffs, the “Parties”) through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, Plaintiffs filed their initial Complaint on December 29, 2022;

9 WHEREAS, Plaintiffs served the summons and Complaint on Meta on
10 February 28, 2023; on Twitter, Inc., on January 20, 2023; on Google on February
11 28, 2023; on Amazon.com, Inc., on February 28, 2023, and on the DNC Service
12 Corporation on March 1, 2023;

13 WHEREAS, Meta’s current response to the Complaint is due on or before,
14 March 21, 2023; Twitter, Inc.’s response deadline is April 11, 2023; Google’s
15 response deadline is March 21, 2023; Amazon.com, Inc.’s response deadline is
16 March 21, 2023; and the DNC Service Corporation’s response deadline is March
17 22, 2023;

WHEREAS, the Parties have conferred and agree that, to afford the Moving Defendants adequate time to respond to the Complaint, their deadline to respond to the Complaint should be extended up to and including April 21, 2023;

WHEREAS, Plaintiffs recently stipulated to provide Defendants American Federation of Teachers and the National Education Association until April 21, 2023 to file their responsive pleading;

24 NOW THEREFORE, it is hereby stipulated and agreed that:

25 The Moving Defendants' deadline to respond to the Complaint shall extend

¹ Instagram LLC is incorrectly identified in the Complaint as Instagram, Inc.

² YouTube LLC is incorrectly identified in the Complaint as Youtube, Inc.

³ Amazon.com, Inc. is incorrectly identified in the Complaint as Amazon, Inc.

1 up to and including April 21, 2023.

2 **IT IS SO STIPULATED.**

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4 Respectfully submitted,

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6 Dated: March 21, 2023

KEKER, VAN NEST & PETERS
LLP

7
8 By /s/Paven Malhotra
PAVEN MALHOTRA
MATAN SHACHAM
JANAY M. WILLIAMS

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10
11 Attorneys for Defendants,
12 GOOGLE LLC, ALPHABET, INC.,
AND YOUTUBE LLC

13
14 Dated: March 21, 2023

MCGUIREWOODS LLP

15
16 By /s/ Tanya Greene
TANYA L. GREENE
JONATHAN Y. ELLIS

17
18 Attorneys for Defendant TWITTER,
19 INC.

20
21 Dated: March 21, 2023

WILSON SONSINI GOODRICH &
ROSATI, P.C.

22
23 By /s/ Brian Willen
BRIAN M. WILLENN (pro hac vice
forthcoming)
AMIT Q. GRESSEL
ARIEL C. GREEN ANABA

24
25
26 Attorneys for Defendants,
27 GOOGLE LLC, ALPHABET, INC.,
AND YOUTUBE LLC

1 Dated: March 21, 2023

DAVIS WRIGHT TREMAINE LLP

2 /s/ *Scott Commerson*

3 SCOTT R. COMMERSON

4 Attorneys for Defendant
5 AMAZON.COM, INC.

6

7 Dated: March 21, 2022

KAUFMAN LEGAL GROUP, APC

8 By

9 
10 STEPHEN J. KAUFMAN
11 GARY WINUK

12 Attorneys for Defendant,
13 DNC SERVICE CORPORATION

14 Dated: March 21, 2022

15 LAW OFFICES OF MICHAEL E.
16 REZNICK

17 By

18 /s/ *Michael E. Reznick*
19 MICHAEL E. REZNICK

20 Attorneys for Plaintiffs RICHARD
21 JACKSON, JULIE BRIGGS, and
22 GREGG BUCHWALTER

ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2), the file attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ *Paven Malhotra*

PAVEN MALHOTRA